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Attorneys for Appellant JEFFREY B. GUINN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEFFREY B. GUINN

Appellant,

vs.

CDR INVESTMENTS, LLC, a Nevada Limited Liability Company; DONNA A. RUTHE as trustee for the CHARLES L. RUTHE TRUST and on behalf of his Individual Retirement Account; DONNA A. RUTHE, in her representative capacity as trustee for the FRANK E. GRANIERI REVOCABLE LIVING TRUST

Respondents.

Case No. BK-S-13-18986-BTB
CHAPTER 7

Adversary No. BK-S-14-01007-BTB

Case No: 2:19-cv-00649-JAD

**STIPULATION TO EXTEND BRIEFING
SCHEDULE FOR APPEAL DUE TO
COVID-19 PANDEMIC**

(Second Request)

Appellant Jeffrey B. Guinn (“Appellant”), by and through his attorney of record, the law firm of Bailey❖Kennedy, and Respondents CDR Investments, LLC and Donna A. Ruthe, as trustee for the Charles L. Ruthe Trust and his individual retirement account and the Frank E. Granieri Revocable Trust (“Respondents”), by and through their attorneys of record, the law firm of Sylvester & Polednak, Ltd., hereby STIPULATE AND AGREE that:

- A National Emergency related to the impact of the COVID-19 global pandemic has been declared along with emergency declarations by several states across the United States, including Nevada.

- The Parties, their counsel, and all related individuals are focused, first and foremost, on health and safety matters during this global pandemic and each Party has issues with limited staffing and resources, limited access to files and other resources, and other hurdles related to social distancing and business and school closures.
- Most, if not all, state courts and all federal courts in Nevada have recognized the need for stays/postponements of litigation matters and cases.
- Undersigned counsel, who is primarily responsible for the Opening Brief, is working remotely to achieve social distancing objectives. While he is able to complete certain tasks, he cannot work nearly as efficiently as was able to do from his office, especially considering he has a two-year old toddler who is home from daycare.
- Furthermore, undersigned counsel is limited in his ability to confer with other attorneys and paralegals responsible for this matter.
- The Memorandum Decision that is the subject of this appeal is quite lengthy (115 pages). The underlying adversary proceeding trial was three weeks long. As shown by the Designation of Record and Statement on Appeal [Dkt. # 463], there are numerous relevant exhibits. Thus, this appeal is more complicated than a typical adversary proceeding appeal.
- Due to the above, the Parties respectfully request an extension to the current briefing schedule, moving all dates back 30 days.

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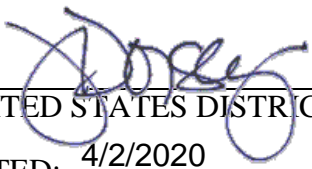
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- Accordingly, the parties stipulate to extend the briefing schedule as follows:
- Opening Brief – May 8, 2020.
 - Answering Brief – June 8, 2020.
 - Reply Brief – June 29, 2020.

DATED this 31st day of March, 2020. DATED this 31st day of March, 2020.
SYLVESTER & POLEDNAK, LTD. **BAILEY ♦ KENNEDY**

By /s/ Jeffrey R. Sylvester By /s/ Joseph A. Liebman
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Attorneys for Appellant

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
DATED: 4/2/2020